

TO: The Federal Communications Commission, Washington, DC

DOCKET #: 14-127

RE: Expansion of Online Public File Obligations to Cable and Satellite and also on Expanding Online Public File Obligations to Radio

FROM: Sean Troland, Christian Ministries, Inc., Essex Junction, Vermont

DATE: March 12, 2016

Christian Ministries, Inc. ("CMI") dba The Light Radio Network, licensee of a non-commercial network of seven full power radio stations and six translators, broadcasting to over 60% of the communities in Vermont, would like to comment on the above referenced docket.

The NPRM FCC 14-209 at paragraph 66 suggests that small, NCE stations such as CMI may be exempt from maintaining an online public file. I would ask that this exemption be adopted for the reasons submitted below.

The additional requirement of maintaining on line public files would be a detriment to our already limited resources. Because of our non-commercial status, our means of attaining income is limited. We depend on the generosity of our listeners and the support of underwriters, which, due to NCE regulations, can be difficult to secure. Historically the Commission has done its best to exempt NCE stations from some of the costly regulations imposed on commercial stations due to the understanding of limited funding. We would humbly ask that the Commission continue this practice and exempt NCE stations from this on line public file obligation.

CMI operates our network of 13 frequencies with less than five full-time staff, a handful of part time employees, and volunteers. And as previously mentioned, we function on a very tight budget and cannot afford the addition of an employee, or even the additional time involved to pay an hourly, part-time employee. To that end, maintaining an on-line public file would be a burden to an already stretched staff.

In our listening area we do our utmost to serve our public not only with our broadcasting, but also with outreaches, regional radio reports, concerts, and on location visits. We have never shirked our duties to the public we serve. That said, with the additional stretching of our staff and our resources in maintaining an on line public file, there is a concern we would not be able to serve the public to the extent we have been able to in the past 30 years of our existence as a radio ministry.

CMI is a radio network that provides teaching and talk programs that strive to encourage, inspire and educate our listeners in their faith as well as serving their families and communities. We offer programs that provide family and financial advice. And as a NCE station, we are prohibited from selling political advertising, which I understand may be another reason for the proposed online public file transparency – another reason to exempt all NCE radio stations from this obligation.

In conclusion, as has been previously stated in this comment, the Commission has exempted smaller NCE stations from financially burdensome regulations – EEO being an example. If the Commission chooses to apply these on line public file requirements to NCE radio stations, CMI politely requests there be an exemption provided to small NCE radio stations with a staff of less than five full-time employees.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'ST', with a long horizontal line extending to the right.

Sean Troland
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